<u>REMARKS</u>

Claims 1-45 are pending in this application, of which Claims 1, 23 and 45 are independent claims. Claims 1, 23 and 45 have been amended to define still more clearly what Applicants regard as their invention.

Claims 1-45 were rejected under 35 U.S.C.§ 103(a) as being obvious from the Microsoft Office 97 User Manual (1998) (Winter et al.) in view of U.S. Patent 5,950,196 (Pyreddy et al.).

The general purpose and nature of the present invention have been adequately discussed in previous papers, as has *Winters*. That discussion will not be repeated herein, except as appears necessary.

The aspects of the present invention to which the respective independent claims are directed, involve a document segmentation technique, for segmenting a list type table for describing data or a layout type table representing between tags defined in a language for use in composing web pages. In addition, cell vectors representing characteristics of cells having at least one of row width and column width of the cells are generated by table analysis, and cell vectors representing characteristics of cells having at least one of row width and column width of the cells are generated. In addition, cell position data indicating a positional relationship between cells is generated, by analyzing a table in a document to be processed.

Mores specifically, Claim 1 is directed to a document segmentation apparatus for segmenting a list type table for describing data or a layout type table represented between tags defined in a language for use in composing web pages. That apparatus comprises table analyzing means for generating cell vectors representing characteristics of cells having at least

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one of row width and column width of the cells, and cell position data indicating a positional relationship between cells, by analyzing a table in a document to be processed, and table type judging means for judging whether the table that has been analyzed is a list type table for describing data or a layout type table for describing a layout of page with reference to the cell position data and the cell vectors generated by the table analyzing means. Also provided are first segment generating means for generating a plurality of segments by dividing the table with a first method in case that the table type judging means judges that the table that has been analyzed is the list type table. There is also provided a second segment generating means for generating a plurality of segments by dividing the table with a second method in a case in which the table type judging means judges that the table that has been analyzed is of the layout type of table.

According to the Examiner, in the method of using Microsoft Excel set out in *Winter*, it is necessary to have analyzed the table to know the location of all the cells in the table, and it is inherent that a table is a method of laying out data. However, since the present invention as recited in Claim 1 uses a document segmentation apparatus for segmenting a list type table for describing data or a layout type table representing between tags defined in a language for use in composing web pages, one cannot, based on the method of using Microsoft Excel, say that it is necessary to have analyzed the table to know the location of all the cells in the table, or that it is inherent that a table is a method of laying out data. That is, as far as Applicants can see, *Winter* fails to disclose a document segmentation apparatus for, or method of, segmenting a list type table for describing data or a layout type table representing between tags defined in a language for use in composing web pages.

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In addition, according to the Examiner, *Winter* generates position data to represent a position of a cell. *Winter*, however, fails to disclose a cell vector to represent a characteristic other than a cell position. That is, *Winter*, fails to disclose table analyzing means as recited in Claim 1, that generate cell vectors representing characteristics of cells having at least one of row width and column width of the cells, and cell position data indicating a positional relationship between cells, by analyzing a table in a document to be processed.

In addition, *Winter* and *Pyreddy* both fail to suggest generating a plurality of segments by dividing a table with a first method in a case in which a table type judging means judges that a table that has been analyzed is of the list type of table, and generating a plurality of segments by dividing the table with a second method in a case in which a table type judging means judges that the table that has been analyzed is of the layout type of table. Therefore, even if *Winter* is combined with *Pyreddy* in the fashion proposed in the Office Action (and even assuming that such combination would be proper), the apparatus of Claim 1 would not result from such combination. Thus, Applicants submit that Claim 1 is allowable over those documents, taken separately or in any proper combination.

Claims 23 and 45 are, respectively, method and memory-medium claims corresponding to apparatus Claim 1, and are deemed allowable for the same reasons.

A review of the other art of record has failed to reveal anything which, in Applicant's opinion, would remedy the deficiencies of the art discussed above, as references against the independent claims herein. Those claims are therefore believed patentable over the art of record.
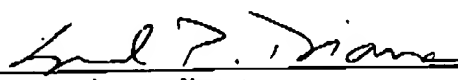
The other claims in this application are each dependent from one or another of the independent claims discussed above and are therefore believed patentable for the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

This Amendment After Final Action is believed clearly to place this application in condition for allowance and its entry is therefore believed proper under 37 C.F.R. § 1.116. In any event, however, entry of this Amendment After Final Action, as an earnest effort to advance prosecution and reduce the number of issues, is respectfully requested. Should the Examiner believe that issues remain outstanding, he is respectfully requested to contact Applicants' undersigned attorney in an effort to resolve such issues and advance the case to issue.

In view of the foregoing amendments and remarks, Applicants respectfully request favorable reconsideration and passage to issue of the present application.

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Applicants' undersigned attorney may be reached in our New York office by telephone at (212) 218-2100. All correspondence should continue to be directed to our below listed address.

Respectfully submitted,

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